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Attorneys for Defendant
Samsung Electronics America, Inc.

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

NEIL LIEBICK, SHARON CLARK,
individually and as guardian ad litem for
JANE DOE 1, JANE DOE 2, and JOHN
DOE; and JASON FRANKLIN,

Plaintiffs,

v.

SAMSUNG ELECTRONICS AMERICA,
INC., COSTCO WHOLESALE CORP.,
and DOES 1-10,

Defendants.

Case No. 2:25-cv-01300-DJC-DMC

**STIPULATION AND ORDER TO EXTEND
DEFENDANTS' DEADLINE TO FILE REPLY
IN SUPPORT OF MOTION TO DISMISS**

Hearing Date: August 21, 2025
Time: 1:30 p.m.
Judge: Hon. Daniel Calabretta

Removal Filed: May 5, 2025

1 Plaintiffs NEIL LIEBICK, SHARON CLARK, individually and as guardian ad litem for JANE
2 DOE 1, JANE DOE 2, and JOHN DOE; and JASON FRANKLIN (“Plaintiffs”) and Defendants
3 SAMSUNG ELECTRONICS AMERICA, INC. and COSTCO WHOLESALE CORP. (“Defendants”)
4 (collectively “Parties”), through their respective counsel, hereby stipulate and agree as follows:

5 WHEREAS, on June 9, 2025, Defendants file a Motion to Dismiss the First Amended Complaint
6 (ECF No. 10);

7 WHEREAS, on June 13, 2025, the Court approved the Parties’ stipulation to set a briefing
8 schedule, setting Plaintiff’s Opposition deadline for June 30, 2025, and Defendants’ Reply deadline for
9 July 14, 2025 (ECF No. 13);

10 WHEREAS, the hearing on Defendants’ Motion to Dismiss is currently set for August 21, 2025;

11 WHEREAS, Plaintiffs filed their Opposition to Defendants’ Motion to Dismiss on June 28, 2025
12 (ECF No. 14);

13 WHEREAS, due to certain scheduling conflicts and other professional obligations, the parties
14 have agreed to a brief extension of Defendants’ deadline to file their Reply;

15 WHEREAS, this requested extension would move Defendants’ Reply deadline from July 14,
16 2025, to July 21, 2025; and

17 WHEREAS, the Parties’ stipulated extension would have no impact on the hearing date, which
18 remains scheduled for August 21, 2025.

19 NOW THEREFORE, in consideration of the foregoing, the Parties, by and through their
20 respective counsel of record, HEREBY STIPULATE and respectfully request that the Court enter an
21 order as follows:

- 22 1. Defendants’ deadline to file their Reply in support of the Motion to Dismiss shall be extended
23 from July 14, 2025, to **July 21, 2025**; and
- 24 2. The hearing on the Motion to Dismiss will remain scheduled for **August 21, 2025**.

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1 **IT IS SO STIPULATED.**

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3 Dated: July 8, 2025

GREENBERG TRAURIG, LLP

4 By: /s/ Anna Yeung
5 Robert J. Herrington
6 Anna Yeung

7 Attorneys for Defendant
8 SAMSUNG ELECTRONICS AMERICA, INC.

9 Dated: July 8, 2025

COOK LAW GROUP

10 By: /s/ Ronald J. Cook
11 Ronald J. Cook
12 Attorney for Plaintiffs

13 Dated: July 8, 2025

MAIRE & DEEDON

14 By: /s/ Patrick Deedon
15 Patrick Deedon

16 Attorney for Defendant
17 COSTCO WHOLESALE CORP.
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ORDER

Pursuant to the Parties' Stipulation to Extend Briefing Deadlines Related to Defendants' Motion to Dismiss and good cause appearing, the Court orders as follows:

1. Defendants' deadline to file their Reply in support of the Motion to Dismiss shall be extended from July 14, 2025, to **July 21, 2025**; and
2. The hearing on the Motion to Dismiss shall remain scheduled for **August 21, 2025**.

IT IS SO ORDERED.

Dated: July 10, 2025

/s/ Daniel J. Calabretta

THE HONORABLE DANIEL J. CALABRETTA
UNITED STATES DISTRICT JUDGE